

United States Government

Department of Energy

memorandum

DATE: JUL 9 1991

REPLY TO: EM-45 (A. Rampertaap, 3-8191)

ATTN OF:

SUBJECT: Concerns Regarding Rocky Flats Operable Unit 1 (881 Hillside) Interim Remedial Action French Drain Collection System

TO: David P. Simonson, RF

A number of concerns regarding the French Drain to be installed at the 881 Hillside to intercept and collect contaminated groundwater were identified by Rocky Flats (RF) staff in recent working meetings with my staff. Attached is a fact sheet summarizing these concerns. Based on the information presented, it is appropriate to reconsider the remediation technique at the 881 Hillside.

It is recommended that Rocky Flats Office revise the Interim Remedial Action Plan (IRAP) and Environmental Assessment (EA) as described in Option 2 of the fact sheet. This will allow new information to be evaluated and a more appropriate remediation technology to be identified by the integrated Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Resource Conservation and Recovery Act and National Environmental Policy Act (NEPA) process. Revising and combining both documents into a single document meets the DOE guidance regarding the integration of CERCLA and NEPA and ensures that, regardless of the technology selected by the NEPA process, an IRAP to implement that technology will be available in a timely fashion and will adequately address recently identified issues.

Specific recommendations are as follows:

- DOE/RF should immediately inform the regulators that the selection of the French Drain to capture and collect the contaminated groundwater does not appear to be environmentally and technically sound, or cost effective, in light of new geological and ecological information.
- DOE/RF should immediately begin revision of the IRAP/EA.
- DOE/RF should request revision and extension of the Interim Remedial Action Interagency Agreement milestones to accommodate reevaluation and selection of an acceptable remediation technology for the 881 Hillside.

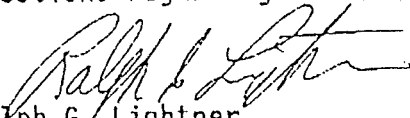
ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCM

By [Signature] (JNA)Date 10/4/91

A-DU01-000247

Please call me on FTS 233-8180 or call Ray Greenberg of my staff on FTS 233-8190, if you have any questions regarding these recommendations.



Ralph G. Lightner

Director

Division of Southwestern Area Programs

Office of Environmental Restoration

Attachment

cc w/attachment:

Pat Whitfield, EM-40

Jack Baublitz, EM-40

Frazer Lockhart, RF

Carol Borgstrom, EH-25

Kitty Taimi, EH-22